

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

In re: ) Chapter 11  
SPECIALTY RETAIL SHOPS HOLDING CORP., et al.,<sup>1</sup> ) Case No. 19-80064-TLS  
Debtors. ) (Jointly Administered)

**DEBTORS' OBJECTION TO  
RETAIL ON 41ST STREET, LLC'S MOTION FOR RELIEF FROM STAY**

Specialty Retail Shops Holding Corp. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), respectfully state as follows in support of this objection (this “Objection”):

## Objection

1. On June 19, 2019, 41st Street, LLC filed a Motion for Relief from Stay under 11 U.S.C. § 362 (“Motion”).<sup>2</sup>
  2. The Motion contains multiple material misstatements. First, the Stub Rent Agreement did not indicate that the Debtors would be out of the premises by June 1, 2019. Second, the court has extended the 365(d)(4) deadline.
  3. More importantly, the Debtors have already vacated and surrendered the premises. The Debtors had been led to believe that the Motion would be withdrawn given that it is now moot,

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Specialty Retail Shops Holding Corp. (0029); Pamida Stores Operating Co., LLC (6157); Pamida Transportation LLC (4219); Penn-Daniels, LLC (0040); Place's Associates' Expansion, LLC (7526); Retained R/E SPE, LLC (6679); Shopko Finance, LLC (1152); ShopKo Gift Card Co., LLC (2161); ShopKo Holding Company, LLC (0171); ShopKo Institutional Care Services Co., LLC (7112); ShopKo Optical Manufacturing, LLC (6346); ShopKo Properties, LLC (0865); ShopKo Stores Operating Co., LLC (6109); SVS Trucking, LLC (0592). The location of the Debtors' service address is: 700 Pilgrim Way, Green Bay, Wisconsin, 54304. The cases have been procedurally consolidated and are being jointly administered under the case caption listed above.

<sup>2</sup> Capitalized terms not otherwise defined shall have the meaning set forth in the Stub Rent Agreement.

but the Motion has not been withdrawn at this time. Accordingly, the Debtors file this Objection out of an abundance of caution.

4. The Debtors reserve all rights to amend, modify, and supplement this Objection, including, but not limited to, asserting additional objections based on law or fact, and providing evidence in support thereof.

*[Remainder of page intentionally left blank.]*

Dated: July 5, 2019

/s/ Lauren R. Goodman

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